

EXHIBIT 20

Declaration of Leah Godesky

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CASE NUMBER: 16-cv-1054 (WMW/DTS)

Fair Isaac Corporation, a Delaware corporation,
Plaintiff,
versus
Federal Insurance Company, and Indiana
corporation, and ACE American Insurance Company, a
Pennsylvania corporation,
Defendants.

VIDEOTAPED DEPOSITION OF EXPERT WITNESS

BILLY McCARTER

TAKEN: 5 June 2019

BY: Jackie McKone

<p style="text-align: right;">Page 178</p> <p>1 Q. You're specifically referring to TAPS; correct?</p> <p>2 A. I am. I am.</p> <p>3 Q. Do you know how many -- and TAPS stands for what</p> <p>4 again?</p> <p>5 A. Texas Accident Prevention. It's a workers' comp</p> <p>6 compliance requirement for the state of Texas.</p> <p>7 Q. And so some insurance applications need to comply</p> <p>8 with TAPS in Texas; correct?</p> <p>9 A. Correct.</p> <p>10 Q. Do you know how many insurance policies that</p> <p>11 affects every year?</p> <p>12 A. No I do not.</p> <p>13 Q. Did you ask anybody?</p> <p>14 A. It doesn't matter whether it's one or many, but</p> <p>15 no, I did not.</p> <p>16 Q. So why do you say that the -- is it your opinion</p> <p>17 that the features, functionality provided by Blaze</p> <p>18 within the TAPS application could be done with an</p> <p>19 Excel spreadsheet; correct?</p> <p>20 A. That's what I was told. Yes.</p> <p>21 Q. That's what you were told by whom?</p> <p>22 A. Helen and Ellen.</p> <p>23 Q. And did you do anything to independently verify</p> <p>24 that that statement was true?</p> <p>25 A. I looked at the descriptions of all the use of</p>	<p style="text-align: right;">Page 180</p> <p>1 A. I don't recall the exact number, but they said a</p> <p>2 small number of people could have done this.</p> <p>3 Q. How many is a small number of people?</p> <p>4 A. I don't know. I didn't ask.</p> <p>5 Q. Over how many years? Do you know?</p> <p>6 A. No.</p> <p>7 Q. You don't know how many policies it involved;</p> <p>8 correct?</p> <p>9 A. Other than it was a low volume business. Workers'</p> <p>10 comp in Texas is poor -- is probably a very low</p> <p>11 volume business.</p> <p>12 Q. Chubb is one of the largest insurance companies in</p> <p>13 the world; correct?</p> <p>14 A. Um-hm.</p> <p>15 Q. They are one of the largest suppliers of business</p> <p>16 insurance in the United States; correct?</p> <p>17 A. Right.</p> <p>18 Q. So a low volume of business to Chubb could be --</p> <p>19 strike that. So you don't have an opinion one way</p> <p>20 or the other as to the cost or expense Chubb would</p> <p>21 have incurred to use an Excel spreadsheet instead</p> <p>22 of Blaze Advisor in the TAPS application --</p> <p>23 A. I do not.</p> <p>24 Q. And you don't -- you have not undertaken an</p> <p>25 analysis to determine whether the use of a</p>
<p style="text-align: right;">Page 179</p> <p>1 TAPS within the depositions and documents that I</p> <p>2 had, and it would confirm that it's a disclosure</p> <p>3 type of check the box function that we disclose</p> <p>4 properly as part of the process. So that's my</p> <p>5 only verification.</p> <p>6 Q. And how would you use an Excel spreadsheet instead</p> <p>7 of Blaze to accomplish the same functionality?</p> <p>8 A. I have an individual pull up the spreadsheet, go</p> <p>9 through the list of applications, and see if it</p> <p>10 complied.</p> <p>11 Q. But you don't know how many applications that</p> <p>12 individual would have to look through?</p> <p>13 A. And according to Ellen, it's a low volume</p> <p>14 business. So I didn't ask how many policies. Low</p> <p>15 volume usually means low, not many, and they said</p> <p>16 that Blaze was used because it was there. It --</p> <p>17 you know, it wasn't -- not Helen and Ellen didn't</p> <p>18 say that because they didn't know Blaze existed.</p> <p>19 Ramesh Pandey basically said they could have</p> <p>20 easily used Excel as well.</p> <p>21 Q. Do you know how many people would need to be</p> <p>22 employed to undertake the same tasks as Blaze</p> <p>23 Advisor with respect to the TAPS application to</p> <p>24 perform the same functions using Excel</p> <p>25 spreadsheet?</p>	<p style="text-align: right;">Page 181</p> <p>1 spreadsheet in the TAPS application instead of</p> <p>2 Blaze Advisor would yield the same results;</p> <p>3 correct?</p> <p>4 A. I -- I'm going by the word, the folks I spoke</p> <p>5 with, that they could use it that way.</p> <p>6 Q. Do you know what percent of Federal's business</p> <p>7 rules were ever implemented into Blaze Advisor?</p> <p>8 A. I couldn't get a count. So no I do not.</p> <p>9 Q. What was your methodology then to determine in</p> <p>10 Paragraph 69 to make the statement, "Only a</p> <p>11 fraction of Federal's business rules and decisions</p> <p>12 were ever loaded into Blaze Advisor," -- "Blaze to</p> <p>13 assist Federal."?</p> <p>14 A. There's hundreds of thousands of rules that are</p> <p>15 executed on a daily basis as part of this business</p> <p>16 activity model, and if you look at the numbers of</p> <p>17 rules that are loaded -- that are on that Fed</p> <p>18 17914, it's a small amount compared to the total</p> <p>19 rules that are being made on a daily basis.</p> <p>20 Q. Do you know how many -- how many rules decisions</p> <p>21 are being made at Federal on a daily basis?</p> <p>22 A. I do not.</p> <p>23 Q. Did you ask anyone?</p> <p>24 A. I asked for total rules relative to plays, but I</p> <p>25 didn't ask them for the total rules across all of</p>